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13 **UNITED STATES DISTRICT COURT**

14 **NORTHERN DISTRICT OF CALIFORNIA**

15
16 JOHN PRUTSMAN, AMIRA MARTZ,
17 SIMCHA RINGEL, NAIOMI MARDEN,
ALANA BALAGOT, CORINNE
18 WARREN, SUNNY LAI, AND DAVID
KLEIN, INDIVIDUALLY AND ON
19 BEHALF OF ALL OTHERS SIMILARLY
SITUATED,

20 PLAINTIFFS,

21 VS.

22 NONSTOP ADMINISTRATION AND
23 INSURANCE SERVICES, INC.,
INCLUSIVE,

24 DEFENDANT.
25

CASE NO. 3:23-CV-01131-RFL

**STIPULATION RE: PROPOSED
EXTENSION OF TIME TO FILE CLASS
CERTIFICATION PRIMARY EXPERT
DISCLOSURE; [PROPOSED] ORDER**

Judge: Hon. Rita F. Lin

1 Pursuant to Civil Local Rule 6-1(b), Plaintiffs John Prutsman, Amira Martz, Simcha
2 Ringel, Naiomi Marden, Alana Balagot, Corrine Warren Sunny Lai, and David Klein, (hereinafter
3 “Plaintiffs”), and Defendant Nonstop Administration and Insurance Services, Inc., (hereinafter
4 “Defendant” or “Nonstop”), collectively referred to as “the Parties”, hereby stipulate to extend the
5 Case Management Schedule, and in support thereof state as follows:

6 **WHEREAS**, on March 14, 2023, Plaintiff Prutsman filed a Complaint (ECF NO. 1), and
7 several related actions were thereafter filed (the “Related Actions”);

8 **WHEREAS**, on May 4, 2023, this Court granted Plaintiffs’ Motion to Consolidate the
9 Related Actions (ECF No. 26);

10 **WHEREAS**, on May 25, 2023, Plaintiffs filed their Consolidated Amended Class Action
11 Complaint (ECF No. 38);

12 **WHEREAS**, on June 15, 2023, Defendant filed its Motion to Dismiss Plaintiffs’ Amended
13 Class Action Complaint (ECF No.39);

14 **WHEREAS**, on August 16, 2023, this Court issued its Order Granting in Part and Denying
15 in Part Motion to Dismiss;

16 **WHEREAS**, on January 24, 2024 this Court held a Case Management Conference and set
17 a case schedule, up to and including the December 17, 2024 hearing date for Plaintiffs Motion for
18 Class Certification. (ECF No. 74). The Court further set the deadline to complete ADR as May 31,
19 2024. *Id.*;

20 **WHEREAS**, the Parties are requesting that the Court extend each of the non-ADR
21 deadlines an additional 90 days to allow the Parties to engage in private mediation without
22 incurring additional time or expense, and while conserving judicial resources;

23 **WHEREAS**, the requested enlargement of time will allow the Parties to devote their time
24 and resources to discuss a potential resolution of the Consolidated Actions and explore the
25 possibility of mediation;

26 **WHEREAS**, the requested time modifications will enlarge each non-ADR date by 90 days,
27 which is in line with the Court’s deadline of May 31, 2024 for the Parties to complete ADR;

NOW THEREFORE, subject to the Court's approval and Order, it is stipulated by and between the parties, through their respective counsel of record, that the Case Management deadlines be enlarged by 90 days as follows:

Event	Original Deadline	Enlarged Deadline
Class Certification Primary Expert Disclosures	2/12/24	5/13/24
Class Certification Rebuttal Expert Disclosures	4/1/24	7/1/24
Last Day to File Class Daubert Motions	7/24/24	10/22/24
Motion for Class Certification	9/3/24	12/2/24
Opposition to Motion for Class Certification	11/1/24	1/30/25
Reply to Motion for Class Certification	11/26/24	2/24/25
Hearing on Motion for Class Certification	12/17/24	3/17/25

Dated: February 12, 2024

COLE & VAN NOTE

By: /s/ Scott Edward Cole
Scott Edward Cole, Esq.

Dated: February 12, 2024

**MILBERG COLEMAN BRYSON
PHILLIPS GROSSMAN, PLLC**

By: /s/ Gary M. Kilnger
Gary M. Klinger, Esq.

Plaintiffs' Interim Co-Lead Class Counsel

Dated: February 12, 2024

CIPRIANI & WERNER PC

By: /s/ Jill Fertel
Jill H. Fertel, Esq.

Counsel for Defendant

ORDER

THE PARTIES HAVING STIPULATED, AND GOOD CAUSE APPEARING, the Court hereby enters its Order extending the Case Management Deadlines as follows:

Deadline to amend the pleadings is June 19, 2024;

Class Certification Primary Expert Disclosures due by May 13, 2024;

Class Certification Rebuttal Expert Disclosures due by July 1, 2024;

Last Day to File Class Daubert Motions is October 22, 2024;

Motion for Class Certification due by December 2, 2024;

Opposition to Motion for Class Certification due by January 30, 2025;

Reply to Motion for Class Certification due by February 24 2025;

Hearing on Motion for Class Certification set for March 17, 2025 10:00 AM in San Francisco, Courtroom 15, 18th Floor before Judge Rita F. Lin.

IT IS SO ORDERED.

Dated: _____, 2024

Hon. Rita F. Lin
United States District Court for the Northern
District of California